

Before The
Federal Communications Commissions
“RM-11305, Rules concerning permitted emissions and control requirements”

To: The Commission

Communications Think Tank, CTT, has submitted a proposal of deregulation of the Amateur Radio Service; this proposal has been designated by the Commission as RM-11305. My comments in opposition to these proposed matters follow.

Discussion:

The CTT proposal seeks deregulation mandatory segregation of emission mode types in favor a voluntary system of coordination of use. The proposal is based on a stated desired to increase spectrum utilization and efficiencies of operation.

The foundation of this proposal assumes several points that are neither been submitted as factual matters as part of the Petition for Rulemaking, reference CTT 20 June, 2005 submission, or established as a direct benefit to the Amateur Radio Community as a whole.

Point 1: Under a principle of maximum use of resources by the maximum number of licensed users this proposal fails due to a lack of information which would allow claims of greater use by all to be evaluated. No information is provided as to the current breakdown of spectrum use for Digital Users engaged Internet based, i.e. forward of email, message traffic, nor does the proposal show traffic analysis that indicates that Digital Users are currently constrained by current regulations. As a minimum, details as to historical numbers of messages relayed, originator and intended recipients and other details should be provided to properly evaluate these assertions.

Point 2. Depending on details which were not provided as part of the CTT proposal, an evaluation of the benefits of the stated purposes of the proposal against the potential negative effects on the Amateur Community could be undertaken. Claims made that deregulation would improve utilization of scarce spectrum by the larger Amateur Radio community cannot be substantiated. In fact, deregulation could in fact disadvantage simple and casual users in favor of bulk email distribution schemes over Amateur Radio frequencies.

Point 3. It would appear that this rule making as currently constructed would tend to expand and give preferential treatment to automated data transfer methods over HF frequencies which typically do not involve direct human to human interaction. While these services are of interest to a small segment of the Amateur community, they do represent a change from what has been a traditional human to human communications interchange to a more sterile computer to computer interchange point of view. These automated computer to computer over RF link interchanges place higher value on the information content than the aspects of improving operating skills, understanding of technical characteristics of propagation, equipment utilization and other skills which have traditionally been part of Amateur Radio. In short, the Amateur Radio ceases to be about operating the radio equipment, and more about the content of the data and moving data from point to point.

Point 4. The CTT proposal is silent on how the “Voluntary” agreement and constraints would be implemented. At the current time, the Commission recognizes localized coordination of VHF and UHF spectrum using voluntary groups, however there is no current historical group which would have the resources to undertake such tasks for HF frequencies. Lacking sufficient “Voluntary” coordination, the instances of interference reported to the Commission will most likely increase if this proposal would be implemented. Without a regulatory framework in place, what determines which operation is correct.

Point 5. The CTT proposal claims an encouragement of digital technologies in a “progressive” environment, yet provides no details of how experimentation has been hindered by the current regulatory environment.

As an adjunct part of this point, a fundamental issue of fairness and transparency arises when proponents of digital modulation techniques are proposed for operation over public spectrum which are proprietary to a single vendor. One such modulation scheme currently in use is Pactor III, developed by STC Limited. The technical details for this modulation technique has not been released to the general public in sufficient detail to allow creation of alternative methods of communication in this modulation format. In essence, an encryption by means of a economic barrier has been created. The current operation of Pactor III type modulation on Amateur Spectrum allocations leads to a high potential for misuse due to the lack of scrutiny of message content by fellow Amateur operators. It has long been a stated position Commission for the Amateur Service to be self policing, use of proprietary modulation techniques seems to be counter to this objective.

Point 6. CTT in its proposal asserts that “friction” between hypothetical digital systems and other human communications in crowded band conditions.

This assertion is false when consideration is given to whom or rather what is actually operating the actual radio equipment at any given time.

In the “Automated Robot” systems favored by CTT, a computer program which has implemented some busy frequency detection routine is pitted in competition for use of a frequency against a human operator. Human operators for the most part are respectful of fellow human operators and are diligent in efforts not to interfere with a fellow human operator communications, resulting in conflicts being resolved using interpersonal skills. Automated stations are programmed to carry out the function of moving data from one place to another, limited only by the implementation of busy channel detection programming. Spectrum conflicts occurring due to automated systems being allowed to freely operate in spectrum allocations where humans are engaged in communications, with no “live” human operating the automated system potential for conflict will increase dramatically with no hope of rapid resolution of conflicts. This in turn will build resentment between “live” communications and automated communications making for a very tense situation.

Summary

The CTT proposal seeks to change spectrum policy and regulations based on some presumption of need which has not been demonstrated. The current system of regulation has served the Amateur Radio community well, and I see no advantage to changing it at the current time. I recommend against approval of this proposal and a thorough review of current operation of automated systems, modulation techniques in use and content of messages transported by automated systems.

Respectfully Submitted;

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